

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party
Plaintiff.

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party Defendant.

Case No. 22-cv-10904 (JSR)

**DECLARATION OF FELICIA H. ELLSWORTH IN SUPPORT OF JPMORGAN
CHASE BANK, N.A.'S MOTION TO EXCLUDE
PLAINTIFF'S PROFFERED EXPERT OPINIONS**

Pursuant to 28 U.S.C. § 1746, I, Felicia H. Ellsworth, declare under penalty of perjury as follows:

1. I am a member in good standing of the bar of the Commonwealth of Massachusetts. I am one of the attorneys representing Defendant JPMorgan Chase Bank, N.A. ("JPMC") in the above-captioned action and have been admitted to this Court pro hac vice. I am a Partner with the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts 02109. I am familiar with the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of the June 16, 2023, Expert Report of Bridgette Carr, designated confidential pursuant to the Protective Order in this matter and filed under seal.
3. Attached as Exhibit 2 is a true and correct copy of a document produced by Jane Doe 1 in the related case captioned *Doe 1 v. JPMorgan Chase Bank, N.A*, No. 1:22-cv-10019-JSR (S.D.N.Y.), Bates stamped JDoe_JPMC_001985, designated confidential pursuant to the Protective Order in this matter and filed under seal.
4. Attached as Exhibit 3 is a true and correct copy of excerpts of the January 31, 2017, Plaintiff's Response to Defendant's Motion for Summary Judgment, in the case captioned *Virginia L. Giuffre v. Ghislaine Maxwell*, Case No. 15-cv-07433-RWS (S.D.N.Y.), which contains confidential information pursuant to the Protective Order in this matter and filed under seal.
5. Attached as Exhibit 4 is a true and correct copy of a document produced by Plaintiff the Government of the United States Virgin Islands, Bates stamped VI-JPMC-000002992, designated confidential pursuant to the Protective Order in this matter and filed under seal.
6. Attached as Exhibit 5 is a true and correct copy of excerpts of the transcript from the July 7, 2023, Deposition of Bridgette A. Carr, designated confidential pursuant to the Protective Order in this matter and filed under seal.
7. Attached as Exhibit 6 is a true and correct copy of an August 1, 2023, email exchange between Andy O'Laughlin and Erica T. Dubno re USVI v. JPMC – Testimony, which contains confidential information pursuant to the Protective Order in this matter and filed under seal.

8. Attached as Exhibit 7 is a true and correct copy of the June 16, 2023, Expert Report of Jonathan J. Rusch, designated confidential pursuant to the Protective Order in this matter and filed under seal.
9. Attached as Exhibit 8 is a true and correct copy of excerpts of the transcript from the June 27, 2023, deposition of Jonathan Rusch, designated confidential pursuant to the Protective Order in this matter and filed under seal.
10. Attached as Exhibit 9 is a true and correct copy of the June 16, 2023, Expert Report of Robert J. Jackson, Jr., designated confidential pursuant to the Protective Order in this matter and filed under seal.
11. Attached as Exhibit 10 is a true and correct copy of the May 30, 2023, Executed Mediation Confidentiality Agreement, which contains confidential information pursuant to the Protective Order in this matter and filed under seal.
12. Attached as Exhibit 11 is a true and correct copy of excerpts of the transcript from the June 30, 2023, deposition of Robert Jackson, designated confidential pursuant to the Protective Order in this matter and filed under seal.
13. Attached as Exhibit 12 is a true and correct copy of the June 13, 2023, Expert Report of Shaun O'Neill, designated confidential pursuant to the Protective Order in this matter and filed under seal.
14. Attached as Exhibit 13 is a true and correct copy of excerpts of the transcript from the July 7, 2023, deposition of Shaun O'Neill, designated confidential pursuant to the Protective Order in this matter and filed under seal.

15. Attached as Exhibit 14 is a true and correct copy of the June 16, 2023, Expert Report of Jorge Amador, designated confidential pursuant to the Protective Order in this matter and filed under seal.

16. Attached as Exhibit 15 is a true and correct copy of excerpts of the transcript from the June 27, 2023, deposition of Jorge Amador, designated confidential pursuant to the Protective Order in this matter and filed under seal.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 18, 2023

/s/ Felicia Ellsworth

Felicia H. Ellsworth